

CENTER FOR DISABILITY ACCESS
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Attorney for Plaintiff

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

Samuel Love,

Plaintiff,

v.

**Blue Line Motel/Trailer Park
LLC**, a California Limited Liability
Company;
and Does 1-10,

Defendants.

Case 5:18-CV-01252-DMG-KK

**Plaintiff's Application for
Default Judgment by Court
Against Blue Line
Motel/Trailer Park LLC**

Date: September 28, 2018
Time: 9:30 a.m.
Ctroom: 8C

To Defendant Blue Line Motel/Trailer Park LLC, and the attorneys of record, if any: Please take notice that on September 28, 2018, at 9:30 a.m., or as soon thereafter as this matter may be heard by this Court located at United States Courthouse, Courtroom 8C, 8th Floor, 350 West 1st Street, Los Angeles, CA, 90012. Plaintiff Samuel Love will present his application for default judgment against defendant Blue Line Motel/Trailer Park LLC. The Clerk has previously entered the default on Blue Line Motel/Trailer Park LLC, on July 26, 2018.

1 At the time and place of hearing, plaintiff will present proof of the
2 following matters: (1) Defendant Blue Line Motel/Trailer Park LLC, is not
3 minor or incompetent person or in military service or otherwise exempted
4 under the Soldier and Sailor's Civil Relief Act of 1940; (2) Defendant Blue
5 Line Motel/Trailer Park LLC, has not appeared in this action; and (3) Plaintiff
6 is entitled to judgment against said Defendant on account of the claims
7 pleaded in the complaint, to wit: a violation of the Americans with
8 Disabilities Act, and the Unruh Civil Rights Act.

9 The Plaintiff seeks a judgment in the amount of \$4,000.00 in statutory
10 damages and \$4,992.50 in attorney fees and costs as set forth in the
11 attached declaration of Dennis Price and an Order directing the defendant
12 to: provide compliant accessible parking spaces and accessible transaction
13 counter at the property located at or about 950 E. Hobsonway, Blythe,
14 California. This application is based on this notice, the declarations
15 submitted in support of this motion, and other matters which may be
16 presented at the hearing.

17 Notice of this the original application for default judgment by court
18 was served on defendant Blue Line Motel/Trailer Park LLC, on August 24,
19 2018, by first class United States Mail, postage prepaid.

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21 Dated: August 24, 2018

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22 By: /s/ Dennis Price
23 Dennis Price, Esq.
24 Attorneys for Plaintiff
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